

1 ROBERT W. FREEMAN
Nevada Bar No. 3062
2 Robert.Freeman@lewisbrisbois.com
JENNIFER A. TAYLOR
3 Nevada Bar No. 6141
Jennifer.A.Taylor@lewisbrisbois.com
4 LEWIS BRISBOIS BISGAARD & SMITH LLP
6385 S. Rainbow Boulevard, Suite 600
5 Las Vegas, Nevada 89118
Telephone: 702.893.3383
6 Facsimile: 702.893.3789
Attorneys for Defendant USAA Casualty
7 *Insurance Company, erroneously named as*
8 *USAA General Indemnity Company*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 ***

12 NICHOLAS MARTIN, individually,

13 Plaintiffs,

14 vs.

15 USAA GENERAL INDEMNITY
COMPANY, an unincorporated reciprocal
16 insurance exchange; DOES 1 – X; and ROE
CORPORATIONS I – X, inclusive,

17 Defendants.
18

Case No.: 2:25-cv-00099-APG-MDC

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE A
RESPONSE TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

[FIRST REQUEST]

19 COME NOW, the parties, by and through their undersigned counsel of record and hereby
20 stipulate and agree that the time for Defendant USAA General Indemnity Company to file their
21 response to Plaintiff's First Amended Complaint, said response being due on February 14, 2025,
22 be extended until February 28, 2025.

23 **Reason for Extension**

24 Because of the complexity of the claims made in Plaintiff's First Amended Complaint,
25 Defendant USAA General Indemnity Company needs additional time to perform an investigation
26 prior to filing a responsive pleading. This stipulation is made in good faith and not for the purpose

27 ...

28 ...

1 of delay. This is the first extension of time requested by counsel for filing Defendant USAA General
2 Indemnity Company's response to Plaintiff's First Amended Complaint.

3 Dated this 14th day of February, 2025

Dated this 14th day of February, 2025

4 BENSON ALLRED

LEWIS BRISBOIS BISGAARD & SMITH LLP

5 /s/ Joshua L. Benson

/s/ Jennifer A. Taylor

6 JOSHUA L. BENSON

ROBERT W. FREEMAN

Nevada Bar No. 10514

Nevada Bar No. 3062

7 333 N. Rancho Drive, Suite 420

JENNIFER A. TAYLOR

Las Vegas, Nevada 89106

Nevada Bar No. 6141

8 *Attorney for Plaintiff*

6385 S. Rainbow Boulevard, Suite 600

Las Vegas, Nevada 89118

*Attorneys for Defendant USAA Casualty
Insurance Company, erroneously named as
USAA General Indemnity Company*

11 **ORDER**

12 **IT IS SO ORDERED.**

13 Dated this 18th day of February, 2025.

14
15
16 
17 Hon. Maximiliano D. Convillier III
18 United States Magistrate Judge
19
20
21
22
23
24
25
26
27
28